

REMARKS

Applicants have studied the Office Action dated April 23, 2003, and have made amendments to the claims. By virtue of this amendment, claims 1-42 are pending and claims 1, 2, 7, 8, 11, 15, 16, 21, 22, 25, 29, 30, 35, 36, and 39 have been amended. It is submitted that the application, as amended, is in condition for allowance. Reconsideration and allowance of all of the claims in view of the above amendments and the following remarks are respectfully requested.

Formal drawings were required to be furnished in response to this Office Action. In compliance with the Examiner's request, the applicants have been attached twenty-two (22) formal drawing sheets covering Figs 1-22 to this Amendment. No new matter has been added to the drawings.

Claims 1-42 were rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Application Publication No. 2002/0077923 to Siegal et al. ("the Siegal et al. reference") in view of U.S. Patent Application Publication No. 2002/0194081 to Perkowski ("the Perkowski reference"). This rejection is respectfully traversed.

Embodiments of the present invention are directed to an integrated multi-functional management tool using a series of modules to allow different access and manipulations to the customer and product databases for various client representatives over a network. Specifically, the present invention provides a tool to better service customers after a product has been purchased by recording all customer contacts, having product information available for answering questions, and providing updates on any service requests such as repairs or returns. Amended independent claim 1 recites "a method for managing customer and product information over a network using a multi-functional customer relationship management tool, comprising ... creating a plurality of modules which allow specific access and manipulation of the customer and product databases to allow a client representative to track customer contacts with the customer, product information and servicing information " (emphasis added). Independent claims 15 and 29 have been amended to recite similar limitations. Support for the amended claims exists

throughout the original specification. For example, page 5, lines 23-25 states: "the database 60 provides the customer, manufacturer/client, repair facility, call center, and the warehouse with a central location to store, retrieve current, accurate information for varying parts of the client/product management process." No new matter was added. Neither the Siegal et al. reference nor the Perkowski reference disclose, teach or suggest an integrated multi-functional customer relationship management tool using a series of modules to allow different access and manipulations to the customer and product databases.

The Siegal et al. reference is directed solely to a customer/product registration function. Specifically, the Siegal et al. reference is directed to performing an on-line registration over an open computer network (e.g. the Internet) of an item previously purchased by a customer. After registration, the system is able to provide a list of purchasable items to the registering customer for additional purchase. The Siegal et al. reference explains that "at about the time of making an initial purchase, a customer is often inclined to additionally purchase product upgrades or enhancements, or additional products that can enhance the use and enjoyment of the initially purchased product. The present invention provides a method of performing on-line registration over an open computer network of an item previously purchased by a customer... Upon receiving a completed registration form from the customer, a database is searched to generate a list of purchasable items. The selection of the list of purchasable items is based at least in part on the identifier that identifies the purchased item" (See page 1, paragraphs 5 & 6). The Siegal et al. reference focuses solely on registering customer product purchase information and attempting to make additional sales. Nowhere in the cited sections of the Siegal et al. reference describe, teach, suggest or otherwise render obvious the claimed subject matter of using a multi-functional customer relationship management tool ... creating a plurality of modules which allow specific access and manipulation of the customer and product databases to allow a client representative to track customer contacts with the customer, product information and servicing information" (emphasis added). Accordingly, it is respectfully submitted that amended independent claims 1, 15, and 29 (and thus dependent claims 2-14, 16-28, and 30-42) are patentable over the Siegal et al. reference.

The Perkowski reference does not make up for the deficiencies of the Siegal reference. The Perkowski reference is directed to a product information database infrastructure housing links to a variety of product related information for marketing and sales purposes. Specifically, the Perkowski reference states: “by integrating the functionalities provided by systems 2 and 2a shown in Fig. 1, the consumer product related network thereof is transformed into a “functionally-integrated” consumer product marketing, merchandising and education/information system network 2’... to carry out (i.e. perform) four (4) basic product related functions along the demand-side of the retail chain, namely: (1) enabling manufacturers’ marketing, brand and/or product managers to create and manage a composite brand image for each consumer product being offered for sale... (2) enabling manufacturers, retailers, and their advertising and marketing agents to display consumer product advertisements to consumers ... (3) enabling retailers, manufacturers, and their marketing and promotional agents to promote consumer products with consumers ... and (4) enabling consumers to request and obtain reliable information about a manufacturer’s product in order to make informed/educated purchases along the demand side of the retail chain” (See p. 95, paragraph 0985). The Perkowski reference is directed solely to marketing and selling products to consumers in a uniformed brand image. Nowhere in the cited sections of the Perkowski reference describe, teach, suggest or otherwise render obvious the claimed subject matter of using a multi-functional customer relationship management tool ... creating a plurality of modules which allow specific access and manipulation of the customer and product databases to allow a client representative to track customer contacts with the customer, product information and servicing information” (emphasis added). Accordingly, it is respectfully submitted that amended independent claims 1, 15, and 29 (and thus dependent claims 2-14, 16-28, and 30-42) are patentable over the Perkowski reference.

Claims 2, 16, and 30 are further distinguished over the Siegal et al. and Perkowski references. Amended claims 2, 16, and 30 now recite that “the plurality of modules are at least two members of a set of modules comprising a customer interaction module, a return merchandise management module, a warranty administration module, an e-mail module, an inventory management module, a reporting system module and a credit card processing module”. Support for the limitations are throughout the specification. No new matter has been added.

It is respectfully submitted that the Siegal et al. and Perkowsky references do not suggest the limitations of claims 2, 16, and 30. Nowhere in the cited sections of the Siegal et al. and Perkowsky references disclose, teach or suggest using at least two modules from the list of possible modules to service the customer. Accordingly, it is respectfully submitted that amended claims 2, 16, and 30 are further patentable over the Siegal et al. and Perkowsky references.

Claims 7, 21, and 35 are also further distinguished over the Siegal et al. and Perkowsky references. Amended claims 7, 21, and 35 now recite that “the client representative has access to all customer contact information including prior purchases and prior contacts with the customer” (emphasis added). An example of the support for these limitations can be found on page 12, lines 16-19 of the specification, which states “will list a menu of information available to the CSR such as customer info, purchase history, customer service history, warranty and extended service agreement information, return information, part request information, credit card information, etc.” No new matter has been added.

It is respectfully submitted that the Siegal et al. and Perkowsky references do not suggest the limitations of claims 7, 21, and 35. Although the Examiner cited the Siegal et al. reference for the ability to receive the registration form from the customer, nowhere in the cited sections of the Siegal et al. and Perkowsky references disclose, teach or suggest having access to all customer contact information including prior purchases and prior contacts with the customer. The Siegal et al. or the Perkowsky reference does not teach tracking customer contacts that are not registrations, such as questions, complaints, returns, etc. Accordingly, it is respectfully submitted that amended claims 7, 21, and 35 are further patentable over the Siegal et al. and Perkowsky references.

Claims 8, 22, and 36 are also further distinguished over the Siegal et al. and Perkowsky references. Amended claims 8, 22, and 36 now recite “an email module is used to respond back to the customer, wherein the e-mail module scans the e-mail for key words and categorizes the email for appropriate response using predetermined problem and solution codes and e-mail templates are used to form a response back to the customer” (emphasis added). Support for these limitations can be found from Fig. 7 and on page 16, line 14 – page 17, line 11 of the

specification, which describes the workings of the e-mail module. No new matter has been added.

It is respectfully submitted that the Siegal et al. and Perkowski references do not suggest the limitations of claims 8, 22, and 36. Although the Examiner cited the Perkowski reference as showing e-mail capability, the disclosure of the Perkowski reference is limited to providing kiosks with e-mail capability within “brick and mortar” type retail shopping environments. Nowhere in the cited sections of the Siegal et al. and Perkowski references disclose, teach or suggest an ability to respond back quickly to customer e-mails using a specific e-mail protocol used in the e-mail module. Accordingly, it is respectfully submitted that amended claims 8, 22, and 36 are further patentable over the Siegal et al. and Perkowski references.

Claims 11, 25, and 39 are also further distinguished over the Siegal et al. and Perkowski references. Amended claims 11, 25, and 39 now recite that “wherein the client representative is a repair facility representative, further comprising ... accessing a return merchandise management module; and producing a printable sheet with a bar code identifying a returned product using a commercial bar code font to code the bar code” (emphasis added). An example of the support for these limitations can be found on page 15, lines 18-22 of the specification, which states “by using commercial bar code font to code the RMA number, the repair facility can simply print a bar code label from the return merchandise management module 230 and place it on the returned product.” No new matter has been added.

It is respectfully submitted that the Siegal et al. and Perkowski references do not suggest the limitations of claims 11, 25, and 39. Although the Examiner cited the Perkowski reference to describe the use of codes to identify products, nowhere in the cited sections of the Siegal et al. and Perkowski references disclose, teach or suggest the ability to print bar codes simply using commercial bar code fonts. The Siegal et al. reference has no mention of bar codes, and the Perkowski reference simply describes using codes to identify the manufacturer products. Accordingly, it is respectfully submitted that amended claims 11, 25, and 39 are further patentable over the Siegal et al. and Perkowski references.

Therefore, it is respectfully submitted that the rejection of claims 1-42 under 35 U.S.C § 103(a) should be withdrawn.

Therefore, in light of the above remarks, it is respectfully submitted that claims 1-42 are in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Northridge, California, telephone number (818) 635-9982, to discuss the steps necessary for placing the application in condition for allowance.

Respectfully submitted,

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